ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 – (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 – (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/524-3300

April 23, 2007

Certified Mail
78004 2510 0001 8616 6614

Safety Kleen
Attn: Environmental Coordinator
633 East 138th Street
Dolton, Illinois 60419

Re: 0310690006 -- Cook County
Safety Kleen Systems (Dolton)
ILD980613913
RCRA Permit

Dear Environmental Coordinator:

The Illinois EPA and the United States Environmental Protection Agency (U.S. EPA) have compiled a list of all facilities deemed appropriate and important to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of 3,880 facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. Your facility is part of this 2020 Universe.

As a result, a final remedy needs to be in place (i.e., remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take a while longer). If we have not already done so, we will be working with you to develop a plan and a schedule that achieves this goal before 2020.

Your facility has been included in the 2020 Universe because one or more of the following is true:

- It has a RCRA permit obligation,
- Illinois EPA and U.S. EPA agreed that it needs to be addressed under the RCRA Corrective Action Program, as it at one time operated a hazardous waste management unit subject to the interim status or permit requirements of RCRA.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that Illinois EPA and U.S. EPA have identified your facility – and every other facility in the 2020 Universe – as needing to complete RCRA Corrective Action if they have not done so already. Our national program goal is to address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of facilities will be posted on our web site at http://www.epa.gov/correctiveaction in the near future.

Illinois EPA will work to address remediation concerns at your facility in a manner consistent with your plans for the property. There are a variety of options available for completing the required remediation efforts at your facility, ranging from participation in Illinois EPA's Site Remediation Program to establishment of an Administrative Order on Consent with USEPA under Section 3008(h) of RCRA.

Illinois EPA would like to schedule a meeting with you in the near future to discuss remedial activities at your facility and achievement of the goal mentioned in the second paragraph of this letter. Please contact James K. Moore, P.E. of my staff at 217/524-3295 if you have any questions regarding this letter and to schedule a meeting to discuss the contents of this letter.

Sincerely,

Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:JKM:bjh\072572s.dot

cc: Hak Cho, USEPA, Region 5

William F/I USEPA

FILE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

217/524-3300

CERTIFIED MAIL
P 344 292 222

September 15, 1998

Mr. Bob Schoepke
Safety-Kleen Corporation
1000 North Randall Road
Elgin, Illinois 60123-7857

Re: 0310690006 -- Cook County
Safety-Kleen Recycle Center/Dolton
ILD980613913
Date Received: December 3, 1996; April 24, 1998, July 28, 1998
Log No. B-120-CA-4; B-120-CA-1
RCRA Permit

Dear Mr. Schoepke:

The RCRA Facility Investigation (RFI) Phase II/III Report for the above-referenced facility has been reviewed by the Illinois EPA. The subject report was submitted to meet the corrective action requirements of Condition IV.B of the RCRA permit issued for the Safety-Kleen/Dolton facility (Log No. B-120) and the February 21, 1996 Illinois EPA letter approving the RFI Phase II/III Work Plan. Phase II and Phase III RFI activities documented in the subject submittal were carried out to determine the extent of releases of hazardous waste or hazardous constituents to soil and groundwater at solid waste management units (SWMUs) located within four investigation areas at the above-referenced facility. In addition, this letter is in response to: (1) a letter dated April 23, 1998 which contained analytical data from the resampling at Boring 10-1 near a SWMU being investigated as part of this RFI, this letter is the subject of Condition 4 below; and (2) a July 27, 1998 document which contained an additional investigation workplan.

The RFI Phase II/III Report, as supplemented by the April 23, 1998 letter and the July 27, 1998 workplan, is hereby approved subject to the following conditions and modifications:

1. The SWMUs investigated as part of the Phase II/III RFI, grouped by the associated investigation areas, is as follows (the location of these SWMUs and investigation areas are shown on Figure 2-1 of the RFI Phase II/III Report; note that the investigation areas were originally identified in the Illinois EPA's August 17, 1995 Phase I RFI Report approval letter (B-120-CA-1)):

   a. East Field Investigation Area

b. Southern Investigation Area, which includes:

(1) Former Southeast Tank Farm / UST Area

(2) Former Tank Farm D / Truck Station No. 3

(3) Truck Station No. 10

c. Central Investigation Area, which includes:

(1) Process Building

(2) West Tank Farm Area

(3) Truck Station No. 4

(4) Truck Station No. 9

(5) Driveway to the Facility

d. Northwestern Investigation Area, which includes:

(1) Truck Station No. 5

(2) Former Truck Station No. 6 / North Warehouse Pad

2. Phase I and Phase II RFI soil sampling / analysis results indicate that no releases of hazardous wastes or hazardous constituents have occurred to soils which are considered a threat to human health or the environment at all the units identified in Condition 1 above except: (1) East Field Investigation Area; (2) Truck Station No. 10; and (3) West Tank Farm Area. Condition 3 and 4 below describe the remaining concerns relative to soil at these three SWMUs. As such, except for three SWMUs listed in this Condition, no further action is necessary with respect to soils investigation or remediation as part of the RCRA Facility Investigation at the SWMUs listed in Condition 1 above.

3. As proposed by Safety-Kleen during the March 31, 1998 meeting with Illinois EPA in Springfield, Illinois, further investigation should be conducted around Boring EF-1 in the East Field Investigation Area and around Boring W-2 in the West Tank farm. The goal of this investigation would be to determine the extent of soil contamination above Tier 1 TACO remediation objectives by utilizing the Illinois EPA approved procedures used during

the Phase I and Phase II investigations and the procedures present in Attachment B to Safety-Kleen's July 27, 1998 letter as modified below. Following this investigation a TACO analysis should be conducted.

Attachment B, Proposed Additional Investigation Workplan - Vicinity of Phase I Borings EF-1 and W-2 is hereby approved subject to the following modification: One soil sample should be located at a distance of approximately 10' from Phase I soil sampling locations EF-1 and W-2. These two soil samples may be either in place of or in addition to one of the soil samples proposed to be located 20' to 30' away from EF-1 and W-2 respectively in the Proposed Additional Investigation Workplan.

4. Due to the discrepancies in the results of the analyses conducted on soil samples collected at Location 10-1 (near Truck Station 10) for toluene, one additional soil sample should be collected at the same interval as the previous two samples and analyzed. In the event that this third sample detects toluene at a level below Tier 1 TACO objectives then no further action will be necessary at this unit. Otherwise further evaluation of the contamination in the vicinity of Location 10-1 will be necessary.

5. Based upon the submitted information the groundwater present beneath the facility, between the ground surface and bedrock, is a Class II groundwater; however, any groundwater encountered within the bedrock, which exists at approximately forty (40) feet BGS is a Class I groundwater. Therefore, the facility shall base their comparisons of the shallow groundwater quality data on the Class II standards listed in 35 Ill. Adm. Code 620.420 in all future sampling events.

   Additionally the following comments address certain aspects of the groundwater monitoring program:

   a. Due to the fact that it has been almost two years since the last groundwater monitoring effort, one additional round of groundwater monitoring is necessary to properly characterize the groundwater quality prior to conducting a TACO analysis. This effort must be carried out in accordance with previously approved procedures for all parameters and constituents previously evaluated. Then the facility shall commence the risk assessment consisting of a Tier 2 TACO analysis of the southeast field area, as proposed on page 4-4 of the January 31, 1997 RFI Phase II/III Report Addendum. As such, the facility should conduct a Tier 2 TACO evaluation, following the final 35 Ill. Adm. Code 742 rules and regulations, dated June 6, 1997, for those constituents detected in the groundwater (anywhere within the facility) above the Tier 1 (Class II) clean-up objectives in conjunction with the proposed risk assessment. The facility should note that any TACO evaluation conducted for the impacted groundwater must

utilize site-specific parameters (e.g., hydraulic conductivity, groundwater gradient, total soil porosity, etc.) to determine the risk-based clean-up objectives.

However, if the concentrations of chemical constituents remain in the groundwater above the Class II standard, the facility must review the ongoing adequacy of controls and continued management at the site. Currently, the Class II Groundwater Quality Standards, as they appear in 35 Ill. Adm. Code Part 620.420 are the facility's groundwater CUOs until alternative standards are approved pursuant to 35 Ill. Adm. Code Part 620.450 (a)(4)(B) using the TACO procedures. Approval of alternative standards will require the establishment and maintenance of a Groundwater Management Zone (GMZ) under 35 Ill. Adm. Code 620.250 until the applicable standards are achieved or an adjusted standard is granted by the Illinois Pollution Control Board (PCB). Pursuant to 35 Ill. Adm. Code 620.250 (c), a GMZ will not expire until the Illinois EPA receives documentation confirming the attainment of the applicable (e.g., Class II) standards. With that, the on-going contaminant management must be revisited and reviewed no less often than once every five (5) years. Therefore, it is possible that the facility may have to conduct continued, long term groundwater monitoring, albeit at a reduced frequency.

b. The facility shall provide an explanation for the widely varying groundwater sampling and analysis results in monitoring well MW-7 and its duplicate sample. According to Table 2, of the July 15, 1997 RFA Progress Report and April 1997 Groundwater Monitoring Results, "the detection levels of benzene and toluene have greatly fluctuated over the three (3) sampling and analysis events conducted to date." Additionally, the facility shall provide an explanation as to the sample collection methods, as it appears that the VOC and SVOC samples may have been collected in liter glass and plastic bottles. The Illinois EPA generally recommends that VOC samples be collected and containerized in 40 milliliter clear glass vials, filled to zero head-space.

c. Illinois EPA acknowledges the comments in Safety Kleen's July 27, 1998 letter regarding groundwater issues in a draft Phase II/III Report approval letter provided to the company. However, these comments are neither approved or disapproved as they should be incorporated into and addressed in the TACO analysis required above.

6. The results of the investigations required by Conditions 3 and 4 should be presented in the form of a report to Illinois EPA by December 15, 1998. The report should be developed in accordance with Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports and should include recommended next steps (including TACO analysis, if appropriate) to address any soil contamination in the vicinity of these three areas of concern.

This supplemental RFI report should also contain the Tier 2 TACO analysis of the groundwater as specified in Condition 5 above.

7. In accordance with Condition 3 of the August 17, 1995 Illinois EPA letter, corrective action activities at the Barker Chemical No. 2 property located north of 138th Street are being carried out separately from corrective action activities at the remainder of the facility. As such, the document entitled RCRA Facility Investigation Phase II Extent of Release Report for Safety-Kleen Strip of Property Barker Chemical No. 2 received by the Illinois EPA September 16, 1996 (Log No. B-120-CA-3) is currently under review and will be responded to at a later date.

8. Illinois EPA will be responding to two documents concerning the Former Rexnord Properties at a later date. These documents are as follows: (1) July 15, 1997 Rexnord RFA Programs Report and April 1997 Groundwater Monitoring Results, Safety-Kleen Corporation Recycle Center; and (2) December 24, 1997 Site History and Waste Management Assessment Report, Former Rexnord Properties, Safety-Kleen Corporation Recycle Center.

   A waste management assessment of the Agri-Chain Property located within this facility is also required in accordance with the March 9, 1994 Illinois EPA letter. Since this property is currently in operation, it will be acceptable to perform the waste management assessment after Agri-Chain ceases operation. As such, Safety-Kleen must send notification to the Illinois EPA once Agri-Chain ceases operation. This notification should include a time schedule and expected date for completing the waste management assessment (carried out in accordance with Illinois EPA's March 9, 1994 letter) for the Agri-Chain property.

9. Illinois EPA is currently evaluating the information available on the high pH present in the groundwater under a parking lot at the Safety-Kleen distribution Center and Service Centers in Dolton, Illinois. It is understood that these facilities are adjacent to the Safety-Kleen Dolton Recycling center. This information was discussed during a meeting between representatives of Safety-Kleen and Illinois EPA on March 31, 1998, is present in a letter dated April 21, 1998 with attachments from Safety-Kleen to Metropolitan Water Reclamation District of Greater Chicago (Illinois EPA was carbon copied on this letter), and is present in a letter dated June 22, 1998. The available information will be responded to via a separate letter at a later date.

Should you have any questions regarding the groundwater aspects of this letter, please contact Vickie Broomhead at 217/524-3285; questions regarding any other aspects of this project should be directed to Michael A. Heaton at 217/524-3312.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:TF\mls\981351S

Attachment: Recommended Contents of RCRA Soil and/or Groundwater investigation Reports
Certification Statement, Supplemental RFI Report
Laboratory Certification Statement, Supplemental RFI Report

cc: USEPA, Region V -- Hak Cho
Charlie DeWolf -- TriHydro (Laramie, WY)

RECOMMENDED CONTENTS OF RCRA SOIL AND/OR GROUNDWATER INVESTIGATION REPORTS

This document has been developed to describe the type of information which should be provided when reporting the results of soil and groundwater investigations at waste management units (WMUs) at RCRA facilities.

1. The portion of the final report documenting the results of the required soil sampling/analysis effort should contain the following:

   a. A discussion of: (1) the reason for the sampling/analysis effort conducted at each WMU and (2) the goals of the sampling analysis effort conducted at each WMU;

   b. A scaled drawing showing the horizontal and vertical location where all soil samples were collected at each WMU;

   c. Justification for the selected sample locations;

   d. A description of the procedures used for:

      (1) Sample collection;

      (2) Sample preservation;

      (3) Chain of custody; and

      (4) Decontamination of sampling equipment;

   e. Visual classification of each soil sample collected for analysis;

   f. A discussion of the results of any field screening efforts;

   g. Logs of all soil borings made during the investigation;

   h. A description of the soil types encountered during the investigation, including scaled cross-sections;

   i. A description of the procedures used to analyze the soil samples, including:

      (1) The analytical procedure used, including the procedures, if any, used to prepare the sample for analysis;

      (2) Any dilutions made to the original sample;

(3) Any interferences encountered during the analysis of each sample; and

(4) The practical quantitation limit (PQL) achieved, including justification for reporting PQLs which are above SW-846 levels.

j. A description of all quality control/quality assurance analyses conducted, including the analysis of lab blanks, trip blanks and field blanks;

k. A description of all quality assurance/quality control efforts made overall;

l. A tabular summary of all analytical data, including QA/QC results;

m. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting QA/QC data;

n. Colored photographs documenting the sampling effort; and

o. A discussion of the collected data. This discussion should (1) identify those sample locations where contaminants were detected and the concentrations of the contaminants and (2) evaluate the data collected. This discussion should focus on the data collected during the recent investigation and on data previously collected.

2. The portion of the final report documenting the results of the required subsurface and groundwater investigation should contain, at a minimum, the following information for each WMU:

a. Logs of the borings made during the required subsurface investigation and/or for monitoring well installation;

b. A description of the procedures used in carrying out the subsurface investigation (including the boring procedures) and in any installation of the monitoring wells;

c. Results of all tests conducted in-situ or in the laboratory and a discussion of the procedures used in carrying out the tests;

d. Completed IEPA Well Completion Reports;

e. Scaled drawings showing the location where all borings were made and where all monitoring wells were installed;

f. Well development procedures;

g. A discussion of the geology and hydrogeology of the areas being investigated, including:

(1) A detailed description of the geology;

(2) Physical characteristics of each geologic strata encountered;

(3) Identification of water bearing units encountered;

(4) Depth to the water table;

(5) The horizontal and vertical components of groundwater flow in the water bearing units;

(6) The hydraulic conductivity of the water bearing units.

h. A minimum of two cross-sections depicting the subsurface geology and hydrogeology. These cross-sections should be as close to perpendicular to each other as possible, so that a three-dimensional presentation of this information can be depicted;

i. Information regarding the groundwater sampling/analysis effort as identified in Items 1.a, 1.d, 1.f, 1.h, thru 1.l and 1.n above;

j. Water level measurements made prior to the collection of the groundwater samples; and

k. Maps and supporting data identifying the piezometric surface of the groundwater beneath the facility and the direction of groundwater flow.

TFF:bjh\961871S.WPD

Certification Statement
Supplemental RFI Report
Safety-Kleen
Dolton, Illinois
Log No. B-120-CA-4

The supplemental activities at the facility described in this report have been completed in accordance with the specifications in Illinois EPA's approval letter designated Log No. B-120-CA-4. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. EPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title
Signature of Licensed P.E. or L.P.G. Date	Name of Licensed P.E. or L.P.G. and Illinois Registration Number
Mailing Address of P.E. or L.P.G.:	Licensed P.E.'s or L.P.G.'s Seal:

ECB:MAH\mls\981351S

Laboratory Certification Statement
Supplemental RFI Report
Safety-Kleen
Dolton, Illinois
Log No. B-120-CA-4

Upon completion of the supplemental activities at the facility described as approved by this letter, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and (2) a responsible officer (as defined in 35 IAC 702.126) of the laboratory which conducted the chemical analyses required as part of Phase I of the RFI. The original of this statement shall accompany the original certification statement for the overall RFI Phase II/III CDF Well Evaluation Report.

The sample collection, handling, preservation, preparation and analysis conducted as part of the well evaluation activities at the facility described in this document has been conducted in accordance with the specifications in the approved workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. EPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title of Owner/Operator Representative
Name of Laboratory	Signature of Laboratory Responsible Officer Date
Mailing Address of Laboratory:	
	Name and Title of Laboratory Responsible Officer

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B-120-CA-4

safety-kleen®

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED # _____

November 27, 1996

Edwin C. Bakowski, PE
Manger, Permit Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Re: RCRA Facility Investigation Phase II/III Report, Safety-Kleen Corp. Recycle Center, Dolton, Illinois (ILD ~~981088388~~ ILD 980 613 913)

Dear Mr. Bakowski:

Transmitted with this letter are three copies of the document entitled "RCRA Facility Investigation, Phase II Extent of Release Assessment and Phase III Ground-Water Release Assessment Report, Safety-Kleen Corp. (S-K) Recycle Center, Dolton, Illinois (ILD 980613913)." The report contains the results of the Phase II/III RFI conducted at the S-K facility (633 E. 138th Street).

The investigation was conducted in accordance with the Phase II/III RFI Workplan, dated October 13, 1995 and in accordance with the February 21, 1996 IEPA workplan approval letter. This report pertains to the Phase II/III Investigation for the Dolton Recycle Center proper (633 138th Street). S-K conducted a separate Phase II RFI on the strip of property owned by S-K and located north of 138th Street III Investigation; the Phase II RFI Report for the strip of property was submitted to IEPA on September 14, 1996.

Per the February 21, 1996 IEPA letter, S-K will conduct a confirmation ground-water sampling event, tentatively scheduled for the week of December 9, 1996. The results of the December 1996 monitoring will be presented in an addendum to the RFI report to be submitted on or before February 1, 1997. Upon submittal of the RFI report addendum, the Phase II/III RFI field activities and data collection will be considered complete. S-K intends to submit the certifications requested in Condition 9 of the IEPA letter at that time.

If you have any questions concerning this report, please contact me at (847) 468-2216.

Sincerely,
SAFETY-KLEEN CORP.

For Anne Lunt
Senior Project Manager - Remediation

RECEIVED
DEC - 3 1996
IEPA/DLPC
PERMIT SECTION

032-008

Enclosure(s)

cc: Mike Heaton (IEPA)
Keith Marcott (S-K, Elgin)
John Valerius (S-K, Dolton)
Ed DeSocio (S-K, Dolton)
TriHydro Corporation

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

February 23, 1996

Safety-Kleen Corporation
Attn: Ms. Anne Lunt, Remediation
1000 North Randall Road
Elgin, Illinois 60123

Re: 0310690006 -- Cook County
Safety-Kleen Envirosystems (Dolton)
ILD980613913
Date Received: December 7, 1995
Log No. B-120-CA-2
RCRA - Permit

Dear Ms. Lunt:

This letter is in response to a document entitled "RCRA Facility Investigation Phase II Extent of Release Assessment, Barker Chemical No. 2 Area", dated November 13, 1995. This document was submitted in accordance with Condition 3 of the Agency's August 17, 1995 RFI Phase I Report approval letter regarding RCRA corrective action activities at the above-referenced facility. As stated in Condition 3 of the Agency's August 17, 1995 letter, it is understood that the subject document is concerned solely with the Barker Chemical No. 2 Area and that RFI activities for the remainder of the Dolton facility are being conducted under a separate report (a workplan for Phase II activities for the remainder of the facility was received on October 16, 1995).

This Phase II Workplan for the Barker Chemical No. 2 Area ("BC2") is hereby approved subject to the following conditions and modifications:

1. The proposed soil sampling locations as shown on Figure 3-1 of the subject submittal are acceptable to the Agency, with minor additions. Two additional 'lateral extent' sampling locations should be added, one midway between proposed location 2 and proposed location 6, and the second midway between proposed location 6 and proposed location 10. The intent behind these additional locations is demonstrate that any contamination present has not extended to the neighboring property, or, if it has, the approximate levels of contamination to be expected on the neighboring property.

2. Each soil sampling location, other than the PCB confirmation locations, should be drilled to a minimum depth of (a) groundwater, or (b) native soil. Even if soil samples are not collected, this information will be useful in characterizing the geology and hydrogeology of the site.

3. During the clearing of the vegetation, care should be taken to minimize the tracking of soil from the subject property. That is, if PCBs are not of concern, prior to the backhoe or frontend loader leaving the subject property, any soil on its tracks should be knocked off and should remain at the subject property.

   Additionally, while clearing the vegetation, the rings on a select number of trees may be counted in an effort to determine the possible latest date of activity.

4. Following the completion of the clearing of vegetation and the geophysical surveys, an inventory of drums should be conducted with the goal of removing the drums, and their contents, from the subject property.

5. A report documenting the results of the efforts approved by this letter should be submitted to the Agency by September 1, 1996. If Safety-Kleen finds that additional time is needed to complete the Phase II Report a time extension may be granted by the Agency. This report should contain (a) a summary of the Phase II data, including conclusions concerning extent of impacts defined during the Phase II investigation and (b) a quality assurance evaluation of the data generated by the Phase II RFI. Information in the report regarding soil sampling/analysis efforts should be developed in general accordance with the attached document entitled "Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports".

6. An independent professional engineer licensed to practice in the State of Illinois, or his designee, must oversee all activities approved by this letter.

7. The certification requirements set forth in 35 Ill. Adm. Code 702.126 must be met when submitting the report required by Condition 5 above. This certification must indicate that the investigation was carried out in accordance with the approved workplan, including any modifications/conditions contained in the Agency's letter approving the workplan. The certification statement which must be signed to meet this requirement is attached (entitled Certification Statement, RCRA Facility Investigation, Safety-Kleen, Dolton, Illinois, Log No. B-120-CA-2).

   The certification statement identified above must be signed by a responsible officer of the owner or operator, as defined in 35 Ill. Adm. Code 702.126(a). In addition, the independent licensed professional engineer overseeing the proposed activities, as identified in Condition

6 above, must also sign and seal the certification statement mentioned above. By signing this certification statement, both the owner/operator and the licensed professional engineer overseeing the proposed activities certify that the activities were carried out in accordance with Agency approved procedures.

Finally, a second certification statement must be signed by a responsible officer of the laboratory which conducted any required chemical analyses associated with this investigation. This certification must indicate that all applicable sample collection, preservation, handling, preparation and analytical procedures for which the laboratory was responsible were carried out in accordance with the approved workplan, including any conditions/modifications imposed in the Agency's letter approving the workplan. This second certification must also be signed by a responsible officer of Safety-Kleen. The certification statement which must be signed to meet this requirement is attached (entitled Laboratory Certification Statement, RCRA Facility Investigation, Safety-Kleen, Dolton, Illinois, Log No. B-120-CA-2).

7. If the Agency determines that implementation of this RFI Workplan fails to satisfy the requirements of Section IV of the RCRA Part B Permit (Log No. B-120), the Agency reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

8. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.

9. The following procedure must be utilized in the collection of all required soil samples:

   a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

   b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

      1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;

d. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations where VOCs are a concern;

e. All other soil samples must be collected in accordance with the procedures set forth in SW-846; and

f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

10. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. In addition, sample collection, handling, preservation, preparation and analysis must be conducted in accordance with the procedures set forth in SW-846 and the requirements set forth in this letter.

11. If Safety-Kleen Corporation conducts a Phase II investigation which differs from the described above, then it must provide adequate justification in the report required by Condition 5 above for the variances.

12. The Health and Safety Plan contained in the subject workplan is neither approved nor disapproved. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

13. Reports must be prepared and submitted to the Agency which describe the activities completed each quarter of the calendar year while the investigation is being carried out. The quarterly reports shall contain at a minimum:

    a. An estimate of the percentage of the investigation completed;

    b. Summary of activities completed during the reporting period;

    c. Summaries of all actual or proposed changes to the Workplan or its implementation;

    d. Summaries of all actual or potential problems encountered during the reporting period;

    e. Proposal for correcting any problems;

    f. Projected work for the next reporting period; and

14. The report required by Condition 5 above should contain a general evaluation of the need for corrective measures at the various areas investigated. Guidance regarding the procedures which should be followed in making this determination is contained in the attached guidance document entitled Tiered Approach to Cleanup Objectives. It must be noted that any final Agency action on the development of cleanup objectives will be subject to the appeal provisions of Section 39(a) and 40(a) of the Illinois Environmental Protection Act.

15. The first quarterly report for the months of January-March, 1996 should be submitted to the Agency by April 30, 1996. Reports for future quarters of the calendar year should be submitted in a similar fashion (i.e., at the end of the month which follows the quarter for which the report is due).

Should you have any questions regarding this matter, please contact Michael A. Heaton at 217/524-3312.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MAH:bjh\963644S.WPD

Attachment: Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports
Certification Statement
Laboratory Certification Statemtn
Tiered Approach to Cleanup Objectives

cc: USEPA Region V -- Hak Cho
Jack G. Bedessem, P.E. -- TriHydro Corporation (Laramie, WY)

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

February 21, 1996

Safety-Kleen Corporation
Attn: Ms. Anne Lunt, Remediation
1000 North Randall Road
Elgin, Illinois 60123

Re: 0310690006 -- Cook County
Safety-Kleen Envirosystems (Dolton)
ILD980613913 D. 2.1
Date Received: October 16, 1995
Log No. B-120-CA-1
RCRA - Permit

Dear Ms. Lunt:

This letter is in response to a document which you submitted entitled "RCRA Facility Investigation Phase II Extent of Release Assessment and Phase III Groundwater Release Assessment Workplan", dated October 13, 1995. This document was submitted in accordance with Condition 5 of the Agency's August 17, 1995 RFI Phase I Report approval letter regarding RCRA corrective action activities being carried out in accordance with the final RCRA permit issued for operation of the above referenced facility. As stated in Condition 3 of the Agency's August 17, 1995 letter, it is understood that the subject document does not contain information related to the Barker Chemical No. 2 Area and that RFI activities for the Barker Chemical No. 2 Area are being conducted under a separate report (a workplan for Phase II activities for the Barker Chemical No. 2 Area was received by the Agency on December 7, 1995).

This Phase II Extent of Release Assessment and the Phase III Groundwater Release Assessment Workplan is hereby approved subject to the following conditions and modifications:

1. The proposed soil sampling locations as shown on Figure 4-1 of the subject submittal are acceptable to the Agency, with one minor addition. One additional 'lateral extent' sampling location should be added approximately forty feet west of previous soil sampling location EF-1 in the East Field Investigation Area. The purpose of this additional soil sample is to determine if the constituents detected in the shallow interval at EF-1 has migrated westward.

2. Each soil sample should be analyzed for those parameters listed in Table 4-2 of the subject submittal using the appropriate test methods. Soil samples that are collected in the vicinity of the East Field Investigation Areas should also be analyzed for polychlorinated biphenols (PCBs).

3. Section 4 of the subject submittal describes the procedures for abandoning boreholes drilled during the investigation. Safety-Kleen must meet the abandonment and reporting requirements listed in 77 IAC Part 920 for the Illinois Department of Public Health.

4. The proposed use of 15' screens in the design of new monitoring wells due to the low permeability of the silty clay subsurface is unacceptable to the Agency. The screen lengths must not exceed 10'.

5. The proposed use of PVC casing material for the construction of the new monitoring wells may be unsatisfactory due to the nature of contamination detected and expected in the soil and groundwater. Therefore, where high concentrations of volatile and/or semi-volatile organic compounds are expected or detected in the groundwater, stainless steel or an equally inert material shall be used.

6. Boreholes shall be logged by a qualified geologist, using Agency-acceptable boring log forms (attached). Monitoring well construction details shall be recorded on Agency-acceptable forms (attached) and submitted to the Agency in the report required by Condition 7 below. Additionally, Safety-Kleen must meet the well construction and reporting requirements listed in 77 IAC Part 920 for the Illinois Department of Public Health.

7. A report documenting the results of the efforts approved by this letter should be submitted to the Agency by December 1, 1996. If Safety-Kleen finds that additional time is needed to complete the Phase II Report a time extension may be granted by the Agency. This report should contain (a) a summary of the Phase II data, including conclusions concerning extent of impacts defined during the Phase II investigation and (b) a quality assurance evaluation of the data generated by the Phase II RFI. It is understood that the above referenced December 1, 1996 date will allow for one sampling event of groundwater monitoring data to be included in the subject report. The sampling data from the second groundwater sampling event should be submitted as an addendum to the report. This addendum should be submitted to the Agency by February 1, 1997 and should contain sampling event results as well as any conclusions reached from this data. Information in the report regarding soil sampling/analysis efforts should be developed in general accordance with the attached document entitled "Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports" and the procedures set forth in the subject submittal.

8. An independent professional engineer licensed to practice in the State of Illinois, or his designee, must oversee all activities approved by this letter.

9. The certification requirements set forth in 35 Ill. Adm. Code 702.126 must be met when submitting the report required by Condition 7 above. This certification must indicate that the combined Phase II/Phase III investigation was carried out in accordance with the

approved workplan, including any modifications/conditions contained in the Agency's letter approving the workplan. The certification statement which must be signed to meet this requirement is attached (entitled Certification Statement, Combined Phase II/III of the RCRA Facility Investigation, Safety-Kleen, Dolton, Illinois, Log No. B-120-CA-1).

The certification statement identified above must be signed by a responsible officer of the owner or operator, as defined in 35 Ill. Adm. Code 702.126(a). In addition, the independent licensed professional engineer overseeing the proposed activities, as identified in Condition 8 above, must also sign and seal the certification statement mentioned above. By signing this certification statement, both the owner/operator and the licensed professional engineer overseeing the proposed activities certify that the activities were carried out in accordance with Agency approved procedures.

Finally, a second certification statement must be signed by a responsible officer of the laboratory which conducted any required chemical analyses associated with this combined Phase II/III RFI. This certification must indicate that all applicable sample collection, preservation, handling, preparation and analytical procedures for which the laboratory was responsible were carried out in accordance with the approved workplan, including any conditions/modifications imposed in the Agency's letter approving the workplan. This second certification must also be signed by a responsible officer of Safety-Kleen. The certification statement which must be signed to meet this requirement is attached (entitled Laboratory Certification Statement, Combined Phase II/III of the RCRA Facility Investigation, Safety-Kleen, Dolton, Illinois, Log No. B-120-CA-1).

10. If the Agency determines that implementation of this RFI Workplan fails to satisfy the requirements of Section IV of the RCRA Part B Permit (Log No. B-120), the Agency reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

11. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.

12. The following procedure must be utilized in the collection of all required soil samples:

    a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;

d. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations where VOCs are a concern;

e. All other soil samples must be collected in accordance with the procedures set forth in SW-846; and

f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

13. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. In addition, sample collection, handling, preservation, preparation and analysis must be conducted in accordance with the procedures set forth in SW-846 and the requirements set forth in this letter.

14. If Safety-Kleen Corporation conducts a Phase II investigation which differs from the described above, then it must provide adequate justification in the report required by Condition 7 above for the variances.

15. The Health and Safety Plan contained in the subject workplan is neither approved nor disapproved. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of

safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

16. Reports must be prepared and submitted to the Agency which describe the activities completed each quarter of the calendar year while the Phase II/III investigation is being carried out. The quarterly reports shall contain at a minimum:

    a. An estimate of the percentage of the investigation completed;

    b. Summary of activities completed during the reporting period;

    c. Summaries of all actual or proposed changes to the Workplan or its implementation;

    d. Summaries of all actual or potential problems encountered during the reporting period;

    e. Proposal for correcting any problems;

    f. Projected work for the next reporting period; and

17. The report required by Condition 7 above should contain a general evaluation of the need for corrective measures at the various areas investigated. Guidance regarding the procedures which should be followed in making this determination is contained in the attached guidance document entitled Tiered Approach to Cleanup Objectives. It must be noted that any final Agency action on the development of cleanup objectives will be subject to the appeal provisions of Section 39(a) and 40(a) of the Illinois Environmental Protection Act.

18. The first quarterly report for the months of January-March, 1996 should be submitted to the Agency by April 30, 1996. Reports for future quarters of the calendar year should be submitted in a similar fashion (i.e., at the end of the month which follows the quarter for which the report is due).

Should you have any questions regarding this matter, please contact Michael A. Heaton at 217/524-3312.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:MAH:bjh\963632S.WPD

Attachments: Recommended Contents of RCRA Soil and/or Groundwater Investigation Reports
Agency Groundwater Boring Logs
Monitoring Well Construction Form
Certification Statement
Laboratory Certification Statement
Tiered Approach to Cleanup Objectives

cc: USEPA Region V -- Hak Cho ✓
Jack G. Bedessem, P.E. -- TriHydro Corporation (w/o att)

TriHydro Corporation

920 Sheridan Street (307) 745-7474
Laramie, Wyoming 82070 FAX: (307) 745-7729

TRANSMITTAL SHEET

To: Ms. Nancy Gutmann-Kelly	**Date:** 12-04-95
Illinois Environmental Protection Agency	**Job No:** 32-07
2200 Churchill Road	**Project**
Springfield, IL 62706	

We are enclosing:	
Copies	
2	RCRA Facility Investigation Phase II Extent of Release Assessment, Barker Chemical No. 2 Area, Safety-Kleen Recycle Center, Dolton, Illinois dated November 14, 1995.

Remarks:

As requested by Mike Heaton of IEPA, enclosed are 2 additional copies of the Dolton RFI. If you have any questions, please contact me at (307) 745-7474.

Thanks.

Charlie DeWolf

If enclosures are not as noted, please notify us at (307) 745-7474

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director
2200 Churchill Road, Springfield, IL 62794-9276
217/524-3300

August 17, 1995

Safety-Kleen Corporation
Attn: Mr. Gary Long, Manager-Remediation
1000 North Randall Road
Elgin, Illinois 60123

Re: 0310690006 -- Cook County
Safety-Kleen Envirosystems (Dolton)
ILD980613913
Date Received: March 3, 1995
Log No. B-120-CA-1
RCRA - Permit

Dear Mr. Long:

This letter is in response to the Phase I RCRA Facility Investigation ("RFI") Report for the above-referenced facility which you submitted February 27, 1995. This report was prepared on your behalf by TriHydro Corporation and was submitted in accordance with Condition 2 of this Agency's August 30, 1994 RFI Phase I Workplan approval letter and the final RCRA permit issued to the above-referenced facility. The subject Phase I RFI report is hereby approved subject to the following conditions and modifications:

1. Based upon a review of the subject submittal, a Phase II investigation should be conducted at the following areas. The "Areas" listed below have been created in order to group together SWMUs which are in close physical proximity to each other. Any references to SWMUs in this letter is intended to refer to these Areas. Phase II of the RCRA corrective action process should concentrate on the Areas as a whole and not on individual units:

   a. Southern Area: This area includes former Tank Farm D, the Former Southeast Tank Farm, Truck Station Nos. 3 and 10, and the former UST.

   b. Central Area: This area includes Truck Station Nos. 4 and 9, and Tankfarm Nos. 3, 4, 5, and 6.

   c. Northwestern Area: This area includes the North Warehouse Pad and Truck Station Nos. 5 and 6.

   d. East Field: This area includes the East Field and Tank Farm No. 2.

   e. Barker Chemical Property

   f. Rexnord/Precision Aire Property

   g. Agri-Chain Area

2. It is understood that reports as summarized in the Agency's March 9, 1994 letter for the Former Rexnord/Precision Aire Property and the Agri-Chain area SWMUs present at the subject facility will be submitted to the Agency for review and approval by no later than December 31, 1997.

3. Due to the unique nature of the Barker Chemical Property area relative to the other SWMUs at this facility, further corrective action activities at this SWMU should be carried out separately from such activities at the other SWMUs of concern at this facility. Therefore, a separate workplan for this SWMU for further corrective action activities at this SWMU should be submitted to the Agency by November 15, 1995. This workplan should contain a general description of the corrective action activities which Safety-Kleen would propose to carry out at this SWMU. A thorough description of the initial investigation efforts and/or interim measures to be carried out must also be provided in this workplan. This workplan should be developed in general accordance with the final RCRA permit issued to the subject facility and IEPA/USEPA guidance regarding RCRA corrective action.

4. While the Agency agrees with the last paragraph on Page 6-11 of the subject submittal which was concerned with the idea that the phenol and phthalates detected throughout the site are not related to any past or present releases, the Agency is still unable to explain their presence in numerous soil samples. The possibility of larger values at an even greater depth needs to be evaluated. Therefore, the Agency is requesting that three additional borings be conducted as part of the Phase II investigation at depths sufficient enough to demonstrate conclusively that the levels of phenols and phthalates are decreasing with depth. If this is demonstrated, then no further action will be required for the levels of phenols and phthalates currently found on site.

5. The next step in the general RCRA corrective action process for the subject facility is the development of a Phase II RFI Workplan for further investigation at the Areas (SWMUs) identified in Condition 1.a through 1.d above. Phase II of the RFI should focus on determining the rate and extent of migration of hazardous waste or hazardous constituents and the concentration of the hazardous waste or hazardous constituents in the soil at each SWMU of concern. This Phase II Workplan should be submitted to the Agency by October 15, 1995 and should be developed in accordance with this letter, and Section IV and Attachment F of the September 29, 1993 final RCRA permit issued to the above-referenced facility (B-120).

   a. Safety-Kleen may propose to conduct certain Phase III activities (investigation for possible groundwater contamination) in conjunction with Phase II activities in order to avoid duplication of effort and to shorten the amount of time necessary for the corrective action process. Development of any portions of this Phase II workplan which deal with a groundwater investigation (Phase III investigation) should be carried out in accordance with

Attachment F of the final RCRA permit issued to the subject facility.

b. The Agency understands that certain activities to be proposed by Safety-Kleen as part of the Phase II investigation may include investigations near the SWMUs referenced in Condition 2 above.

Should you have any questions regarding this matter, please contact Michael A. Heaton at 217/524-3312.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:mah
JKM
cc: USEPA Region V -- George Hamper
Jack G. Bedessem, P.E. -- TriHydro Corporation (Laramie, WY)

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

D.2.1

August 30, 1994

Mr. Scott Davies
Safety-Kleen Envirosystems
1000 N. Randall Road
Elgin, Illinois 60123-7857

Re: 0310690006 -- Cook County
Safety-Kleen Envirosystems Dolton
ILD980613913
Date Received: March 7, 1994
Log No. B-120-CA-1

Dear Mr. Davies:

The RCRA Facility Investigation (RFI) Phase I Workplan for the above-referenced facility submitted by Safety-Kleen Envirosystems has been reviewed by this Agency. This workplan was submitted in accordance with Condition IV.B.2 of the RCRA Part B permit issued for the above-referenced facility (Log No. B-120) on September 29, 1993. The workplan is hereby approved subject to the following conditions and modifications:

1. This RFI Phase I Workplan shall be carried out to investigate for possible releases from the following solid waste management units (SWMUs):

SWMU NO.	NAME
1	Process Area
2	West Tank Farm Area (including Tank Farms #3, 4, 5 and 6 and Process Areas)
3	Former Southeast Tank Farm Area
4	East Field
5	Truck Stations #3, 4, 5, 6, 9 & 10
6	Driveway to Facility
7	Newly Sited Areas:

a. Former Barker Chemical Property
b. Former Rexnord/Precision Aire Property
c. Agri-chain Property

As stated in Condition IV.A.1 of the RCRA Part B Permit issued for the Safety-Kleen/Dolton facility, the purpose of the required Phase I investigation is to demonstrate whether or not hazardous wastes or hazardous constituents have been released from the SWMUs identified above. Therefore, the review of this RFI Phase I Workplan was conducted with this goal in mind.

2. RFI Phase I activities be completed by February 1, 1995. When Phase I is complete, the owner or operator must submit to the Agency certification both by a responsible officer of the owner or operator and by an independent registered professional engineer that the facility completed Phase I in accordance with the specifications in the approved RFI Phase I workplan. In addition, a certification statement meeting the requirements of 35 IAC 702.126 must be provided by a responsible officer of the laboratory which conducted the chemical analyses that the requirements of this letter were met during the chemical analyses of all samples. This certification must address the applicable sample collection, preservation, handling preparation and analytical requirements set forth in this letter. These certifications must be received at this Agency after completing Phase I, or by eight months for certification March 3, 1995. These dates may be extended if Safety-Kleen submits information to the Agency indicating that it is attempting to complete the required activities in a timely manner but needs additional time to complete the investigation.

   The attached certification forms must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the RFI. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

   The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5105 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or engineering services which are performed for a RFI workplan in the State of Illinois must be done by an Illinois P.E.

   Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Section 13.1 of the Illinois Professional Engineering Act.

   As part of the certification, to document the RFI Phase I activities at your facility, please submit a Phase I Report and Summary which includes, at a minimum:

   a. The information identified in Condition 29 below regarding the required soil sampling/analysis effort at each SWMU where such an investigation is necessary;

   b. Information which the workplan indicates will be in the report;

   c. A chronological summary of Phase I activities and the cost involved.

d. Color photo documentation of Phase I activities;

e. A description of the qualifications of personnel performing and directing the RFI activities including contractor personnel; and

f. A general discussion of the activities which should be carried out as part of Phase 2 of the RCRA Facility Investigation.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

3. If the Agency determines that implementation of this RFI Workplan fails to satisfy the requirements of Section IV of the RCRA Part B Permit (Log No. B-120), the Agency reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

4. The Agency cannot accept the proposed recommendation of no further investigation of the Process Area located within the South Warehouse Building, based on the results of a previous integrity evaluation. It was noted that the primary objective of the integrity inspection conducted by the registered professional engineer was to assess the existing integrity of the pavement and secondary containment structures relative to preventing migration of releases to underlying and/or surrounding soils. As such, the certification does not provide an evaluation of the potential for any past migration through the pavement or secondary containment structures.

Information regarding environmental investigations in the area of the Process Building indicate some contamination is likely present beneath and/or around the building. Samples collected from the borehole designated as 1979-2 indicated gasoline odors at the 2.5 and 5 foot depth interval (no mention of chemical odors were noted from the samples collected from the deeper intervals). Releases of hazardous wastes/hazardous constituents within the secondary containment system of the South Warehouse are documented. It is also stated within the subject submittal that minimal information regarding operations within the building is available for operations within the building prior to 1987. Therefore, it is possible that releases within the building occurred prior to 1987.

As such, the issue of whether the pavement and secondary containment system were adequate at that time is the issue; one which cannot be evaluated now. The integrity evaluation presented within the subject submittal did not demonstrate conclusively that the pavement and containment system of the Process Area have been impermeable over the entire operating life of the structure. Therefore, in order to determine whether the secondary containment system of the Process Area prevented migration of hazardous wastes/hazardous constituents, limited sampling/analysis should be conducted around the perimeter of the building. A minimum of four borings shall be performed around the perimeter of the Process Area building, with soil samples collected from the 6-12 and 18-24 inch depth interval. Boring locations shall be biased towards locations where released materials may be present, such as locations near deteriorated area of the containment system, low lying areas, and stained areas. All soil samples collected must be analyzed for volatile organics in accordance with the analytical method outlined in Condition 11. The results of this investigation must be included in the RPI Phase I report required by Condition 22 below.

5. Should the proposed environmental investigations in the area of the West Tank Farm include coring through the secondary containment system then the corings must be properly sealed to ensure the requirements of 35 IAC 724, Subpart J are met. After the corings are sealed, an integrity evaluation, in accordance with the procedures outlined below, must be conducted after the proposed sampling/analysis activities have been completed for the West Tank Farm area.

   The integrity evaluation should be conducted as follows:

   An independent registered professional engineer shall inspect the integrity of the concrete surfaces. These surfaces shall be inspected for cracks which penetrate through the concrete/asphalt. In addition, all construction joints must be inspected to ensure that they are watertight. This inspection must be carried out in accordance with the standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society for Testing and Materials, the American Society of Civil Engineers, etc., which relate to the ability of the concrete/asphalt to contain liquids. The results of this inspection shall be submitted in the form of a report. The report must include (1) a discussion of the procedures used to conduct the inspection, including reference to the standards/recommended procedure used, (2) the results of the inspection, (3) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (4) conclusions reached regarding any cracks or construction joints observed in the areas of concern, (5) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas are indeed watertight), and (6) photographs to support the conclusions reached.

Additionally, if environmental investigations include coring through the concrete/asphalt surfaces of the tank farm, Safety-Kleen should provide diking around the cored area until the surfaces have been adequately sealed. This diking is necessary to minimize the potential for any release of hazardous waste/hazardous constituents into the underlying soils while this investigation is being conducted.

6. A review of Agency files indicates disposal activities may have taken place on the Barker Chemical site located north of the Safety-Kleen facility on 138th Street. A June 20, 1985 report by Ecology and Environment states that solvent contaminated still bottoms were dumped directly onto the ground, and numerous containers holding wastes were observed to be leaking during IEPA and USEPA inspection. Since it appears that waste disposal practices may have been conducted at this site, the proposed environmental investigations should be expanded in an effort to demonstrate that no contamination is present on the property now owned by Safety-Kleen. To demonstrate that no contamination exists, the Permittee shall conduct a soil gas survey of the soils in this area. The soil gas sample locations shall be based on a sampling grid with a sample interval of no greater than 40 feet. Soil samples shall be collected at locations where soil gas concentrations exceed background levels. Should the soil gas survey indicate no evident impact to the soils from suspected operations, a minimum of two soil samples shall be collected from the "disturbed area" at shallow intervals, and analyzed in accordance with Condition 11 below. Should the results of such investigations indicate no environmental impacts, then the Barker Chemical property will not be considered a SWMU of concern, and no additional RFI investigations will be required for this area.

7. The proposed analytical parameter list proposed in the subject submittal appears adequate to detect most of the parameters which were managed at the facility. However, since little information is known regarding the types or volumes of wastes managed at the facility while under Barker Chemical operation, the possibility of parameters outside the list proposed in the submittal is possible. One of the Agency's concerns is the potential for mismanagement/releases of waste oils containing PCBs at the site. Therefore, soil samples collected from the borings designated as EF-1, W-2, W-6, D-1 and one boring from the Barker Chemical property for laboratory analysis must be analyzed for PCBs in accordance with SW-846 Method 8080. Should the Phase I investigation results indicate that PCBs are not constituents of concern at this facility, the requirement for analysis for these parameters will be dropped from the Phase II assessment.

8. In the event that soil conditions do not allow complete recovery in accordance with Attachment 7, Safety-Kleen must conduct sampling in a manner to minimize volatilization of organic compounds. Such procedures should include minimization of disturbance of the sample (i.e., no mixing, no compositing, no aeration), minimal handling of the samples between collection and preservation, and adequate preservation of the samples (e.g., no headspace, storage of the samples on ice).

9. All Quality Assurance/Quality Control (QA/QC) procedures must be conducted in accordance with those as outlined in SW-846, Chapters 1 and 2. The use to these standardized procedures for QA/QC will allow a standardized review of the analytical data. All preservation and handling, including chain of custody, of the samples shall be conducted in accordance with the appropriate procedures outlined in SW-846, Chapter 2, and any required procedures outlined in the specific sample analytical method.

10. In accordance with an agreement between Safety-Kleen and Agency representatives, background sampling and analysis, if necessary, will be deferred until after submittal of the RFI Phase I report.

11. Since the results of the photoionization unit analysis will be useful in determination of the extent of contamination within each of the boreholes, the Agency requires that Safety-Kleen provide the Agency with a report detailing the results of the photoionization unit analysis in tabular form. This report should include at a minimum: 1) documentation that the unit was operated in accordance with the manufacturer's specifications, 2) a description of the calibration procedures used as part of each investigation effort, 3) analysis procedures, and 4) a summary of the analytical results by depth and by borehole. This information should be presented in the RFI Phase I Report.

12. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method for organic analytes is specified, all the organic chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit achieved during the analysis of the TCLP extract must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. Unless specified otherwise above, each soil sample collected for laboratory analysis must be analyzed for, at minimum;

    - SW-846 Method 8240 for volatile organic compounds;
    - SW-846 Method 8270 for semi-volatile compounds;
    - SW-846 Method 8080 for PCBs; and ;
    - SW-846 Methods 1311, 2060, 6010, 7470 and 7740 for metals (note that the analyses for metals must be conducted on the extract from the TCLP test)

13. The following procedure must be utilized in the collection of all required soil samples:

a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

   1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

   2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;

d. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations where VOCs are a concern;

e. All other soil samples must be collected in accordance with the procedures set forth in SW-846; and

f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

14. If the Agency's DLPC determines, based on the data obtained from the Phase I Workplan activities, that there has been no release of hazardous waste or hazardous constituents to the environment from a SWMU identified in Condition 1 above, then no further investigative action will be required for that SWMU. If the Agency's DLPC determines, based on the data, that there has been a release of hazardous waste or hazardous constituents to the environment or that the data is inconclusive, the Permittee will be notified by the Agency's DLPC.

15. If Safety-Kleen conducts a Phase I investigation which differs from the described above, then it must provide adequate justification in the report required by Condition 2.a above for the variances. As stated in Condition 1 above, the Agency feels that the requirements set forth in this letter are necessary to reach a conclusion that there has not been a release from a given SWMU. If the goals of Safety-Kleen are somewhat different than this, then there <u>may be</u> justification for varying from the requirements set forth in this letter.

16. All wastes generated as a result of corrective action activities (e.g., soil cuttings, purged groundwater, equipment decontamination wash and rinsewaters, etc.) are considered Pollution Control Wastes under the provisions of 35 Ill. Adm. Code Part 809, and therefore, at a minimum, classified as a special waste. Safety-Kleen must appropriately characterize these wastes to determine if they are hazardous by characteristic or listing. Should it be determined that these wastes are hazardous, they must be managed as a hazardous waste. In any event, these wastes are considered special wastes, and must be managed as a special waste.

17. The Agency does not accept the use of the corrective action values specified in 55 FR 30798-30884 (July 17, 1990) as a criteria to determine if a particular SWMU has had an impact on human health and the environment. The Agency notes that these levels are proposed, and have not gone into effect on the State or Federal level. When these calues were proposed, IEPA submitted substaantial comments regarding their inadequacy. Also, it must be noted that the proposed soil action levels did not address the impact the residual soil contamination would have on groundwater. The Agency requires that any action level or cleanup objectives used in Safety-Kleen corrective action plan be demonstrated not to adversely impact human health and the environment.

18. Financial assurance for completion of the approved RFI Phase I activities must be provided to the Agency within 60 days of the Agency approval date of the Phase I RFI Workplan.

19. In accordance with 35 Ill. Adm. Code 702.126, Safety-Kleen must provide the Agency with certification of the Phase I RFI Workplan report to be submitted to the Agency after completion of the approved Phase I activities. In addition, the Agency requires that a certification be provided for all laboratory work performed for the purpose of the Phase I activities be provided. Forms for both certifications described above are included as attachments to this Agency response.

20. The Health and Safety Plan contained in the subject workplan is neither approved nor disapproved. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 24 hours of safety and health training off site plus a minimum of one day of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

21. Reports must be prepared and submitted to the Agency which describe the activities completed each quarter of the calendar year while the Phase I investigation is being carried out. The quarterly reports shall contain at a minimum:

    a. An estimate of the percentage of the investigation completed;

    b. Summary of activities completed during the reporting period;

    c. Summaries of all actual or proposed changes to the Workplan or its implementation;

    d. Summaries of all actual or potential problems encountered during the reporting period;

    e. Proposal for correcting any problems;

    f. Projected work for the next reporting period; and

    g. Other information or data as requested in writing by the Agency's DLPC.

22. A quarterly report for the work completed from the date of this letter to October 1, 1994 (the first quarter of the current calendar year during which the required Phase I investigation is taking place) must be submitted to the Agency by October 15, 1994. Subsequent quarterly reports must be submitted in a similar manner until the final Phase I RFI Report is submitted to the Agency.

23. The portion of the final RFI Phase I report documenting the results of the required soil sampling/analysis effort must contain the following information, for each SWMU investigated:

    a. A discussion of (1) the reason for the sampling/analysis effort conducted at each SWMU and (2) the goals of the sampling analysis effort conducted at each SWMU;

    b. A scaled drawing showing the horizontal and vertical location where all soil samples were collected at each SWMU;

    c. Justification for the locations from which soil samples were collected;

    d. A description of the procedures used for:

        1. Sample collection;

        2. Sample preservation;

3. Chain of custody; and

4. Decontamination of sampling equipment.

e. Visual classification of each soil sample collected for analysis;

f. A discussion of the results of any field screening efforts;

g. A description of the soil types encountered during the investigation, including scaled cross-sections;

h. A description of the procedures used to analyze the soil samples, including:

1. The analytical procedure used, including the procedures, if any, used to prepare the sample for analysis;

2. Any dilutions made to the original sample;

3. Any interferences encountered during the analysis of each sample; and

4. The practical quantitation limit achieved, including justification for reporting PQLs which are above those set forth in SW-846.

i. A description of all quality control/quality assurance analyses conducted, including the analysis of lab blanks, trip blanks and field blanks;

j. A description of all quality assurance/quality control efforts made overall;

k. A summary of all analytical data, including QA/QC results, in tabular form;

l. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting quality assurance/quality control data;

m. Colored photographs documenting the sampling effort; and

n. A discussion of the collected data. This discussion should identify those sample locations where contaminants were detected and the concentrations of the contaminants. Conclusions which can be drawn from the information compiled should also be included in this discussion.

Should you have any questions regarding this matter, please contact Eric Minder at 217/524-3274.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:EM/mls/sp323W/1-11
JCM

Attachments: RFI Phase I Certification
RFI Phase I Laboratory Certification Statement

cc: USEPA Region V -- George Hamper

ILD 980 613 913 US EPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

March 9, 1994

Mr. Scott Davies
Safety-Kleen
1000 North Randall Road
Elgin, Illinois 60123-7857

Re: 0310690006 - Cook County
Safety-Kleen/Dolton
ILD980613913
Received: November 17, 1993
Log No.: B-120
RCRA Permit

Dear Mr. Davies: D. 3. 1

This letter is in response to your correspondence of November 12, 1993 regarding revision of the approach of the corrective action investigations for the above referenced Safety-Kleen facility. Since the date of the letter, Agency representatives were given the opportunity to visit the site and inspect the Solid Waste Management Units (SWMUs) for which corrective action investigations were required in the permit. Based upon the results of this site inspection and discussions with Safety-Kleen representatives, the following provides a modification of the list of SWMUs for which corrective action investigations are required, and Agency recommendations for corrective action investigations for each:

No.	SWMU Name	Required Phase I Action
1.	Process Building	Integrity evaluation
2.	West Tank Farm Area (includes Tank Farms #3, 4, 5, and 6 and Process Areas)	Sampling/analysis
3.	Former South Tank Farm Area	Sampling/analysis
4.	East Field	Sampling/analysis
5.	Truck Stations #3, 4, 5, 6, , 9, and 10	Sampling/analysis around perimeter of concrete pads
6.	Driveway to the Facility	Sampling/analysis
7.	Newly Sited Areas:	
	Former Barker Chemical Property	Sampling/analysis
	Former Rexnord/Precision Aire Property	Waste management assessment, sampling/analysis as necessary
	Agri-Chain	Waste management assessment, sampling/analysis as necessary

The required Phase I action for the Process Building should consist of an assessment of its base. It must be conducted by an independent registered professional engineer to determine if the integrity of the pavement and secondary containment structures is such that former releases and potential future spills have not had/do not have a direct migration pathway to the underlying or surrounding soils. The results of this integrity evaluation should be documented in a report which outlines the assessment procedures, and provides a recommendation of whether further corrective actions are necessary based upon the results of the assessment.

In addition, the Agency has revised the list of SWMUs to delete those units regulated under the terms, conditions and requirements of the facility's RCRA Part B permit. The Agency hereby notes that these units will be subject to the RCRA closure standards and requirements of 35 Ill. Adm. Code 724, of which the requirements for environmental investigation are similar, but not identical to corrective action. Of obvious exception to this, the Agency has recommended sampling and analytical activities in the areas of the facility Truck Stations. Information contained in Agency files and in the facility RCRA Part B permit application indicate a number of releases occurring within and in the area of the facility truck stations and loading/unloading areas. During the site inspection, it was evident that some of the truck stations lacked secondary containment structures (i.e., curbs, etc.) to keep large-quantity spills from migrating to surrounding, unpaved areas. In addition, it is unclear from review of available information when such secondary containment structures were constructed or in use during operations by previous owners of this property.

Finally, the required Phase I action for the areas where Rexnord/Precision Aire and Agri-Chain are located or are currently operating consists of an assessment of the waste management activities. The results of such a waste management assessment must be provided to the Agency in the form of a report, and include the following information, at a minimum:

1. A review of current business activities at each site, including waste generation and disposal;

2. A review of historical business activities at each site, including information regarding historic waste generation, management and disposal activities;

3. A discussion of the procedures and the results of a site inspection conducted by a qualified environmental professional which identifies specific historical waste management procedures or current waste management activities which have caused, are suspected to have caused, or are currently causing adverse environmental impact. Of special concern is the identification of any solid waste management units at these properties. This report should include facility maps indicating those areas of concern;

4. Photographs of those areas and/or units identified under 3. above; and

5. A summary of the results of the waste management assessment for the facility, including a discussion of informational gaps and a recommendation for the necessity of further environmental investigations for those units or areas specifically identified under 3. above based on the findings of the review and site inspection.

These reports would be required to be submitted to the Agency for review and approval by no later than December 31, 1997. Based upon the results of this assessment, the Agency and Safety-Kleen would determine the necessity for RFI Phase I activities, including sampling/analysis if necessary, at those suspect locations and/or units identified within the waste management assessment report. It is respectfully requested that Safety-Kleen contact the Agency prior to conducting the site inspection at these two locations and provide the Agency with an opportunity to accompany Safety-Kleen personnel during these inspections.

Currently, the facility RCRA Part B calls for submission of the RFI Phase I Workplan by March 4, 1994. Should additional time be needed to complete this submittal, Safety-Kleen should contact the Agency to modify the submission date.

Should you have any questions regarding this letter, please contact Eric Minder at 217/524-3300.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:EM

cc: USEPA Region V - George Hamper

cc: Maywood
USEPA

B-180

JK

November 12, 1993

Mr. Jim Moore
Manager of Corrective Action and Closure
Illinois Environmental Protection Agency
1240 North 9th Street
Springfield, IL 62702

D. 2. 1

RE: RCRA Facility Investigation at the Safety-Kleen Corp. Recycle Center in Dolton, IL

Dear Mr. Moore:

This letter is in follow-up to our telephone conversation on November 5, 1993 regarding the RCRA Facility Investigation (RFI) at Safety-Kleen's Dolton Recycle Center.

As you suggested, this letter is intended to serve as a basis for discussing the RFI approach at the Dolton facility. Safety-Kleen is in agreement with most aspects of the RFI requirements listed in the facility's Part B Permit. The company is, however, concerned about the Solid Waste Management Units (SWMUs) listed in the permit. Safety-Kleen believes most of the units listed in permit do not meet the definition of a SWMU (see 40 CFR 264.501) because they do not meet the routine and systematic release portion of the definition. In fact, many of the units are relatively new built by Safety-Kleen during upgrading of the facility. In addition, most of units are covered under RCRA closure requirements.

Safety-Kleen believes the RFI should focus on areas of historical concern. The company is, therefore, proposing to modify the SWMU list to the following units:

1. The East Field (SWMU 22)
2. The West Tank Farm Area
3. Barker Chemical No. 2 (SWMU 30c)
4. The former South Tank Farm Area (not previously identified as a SWMU)

Please note that historical concerns related to these units are based on events prior to Safety-Kleen's purchase of the property.

RECEIVED
NOV 17 1993
PERMIT SECTION

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

During our telephone call, you suggested having a meeting at the Dolton facility to inspect the areas of concern and to discuss the RFI approach. I believe this is a good idea and would be happy to schedule a meeting at your convenience.

If you have in questions, please contact me at (708) 468-2216.

Sincerely,

Scott Davies, P.G.
Sr. Project Manager - Remediation

cc: Desi Chari
John Valerius
Gary Long

dolrfijm

B120 (A1)

cc: USEPA

JKM
EM

D.2.1

Safety-Kleen.

August 10, 1994

Mr. Eric Minder
Division of Land Pollution Control - #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, IL 62794-9276

RE: RFI Workplan, Safety-Kleen Dolton Recycle Center

ILD 980613913

Dear Mr. Minder:

Safety-Kleen Corp. held a conference call with the Agency on July 20, 1994, to discuss conditions in a draft Workplan approval letter. Safety-Kleen Corp. received the draft approval letter via fax on June 21, 1994. The call was constructive in understanding the Agency's concerns, and moving this project forward.

Enclosed is a summary of the conference call comments and proposed modifications to the draft approval letter pconsistent with our understanding of the agreements during the conference call. We hope these modifications meet with your approval and help move the process forward. Safety-Kleen is ready to initiate RFI activities promptly on approval of the RFI Workplan. Please contact me at (708) 468-2216 or John Ahern at (307) 745-7474 if you have questions or comments regarding the proposed revisions.

Sincerely,
SAFETY-KLEEN CORP.

Scott E. Davies JA

Scott E. Davies
Senior Project Manager - Remediation

SD:JA:saw/32-01

Enclosures (2)

cc: Gary Long/S-K Elgin
John Valerius/S-K Dolton (w/enclosure)
TriHydro Corporation (w/enclosure)

1000 NORTH RANDALL ROAD ELGIN, ILLINOIS 60123-7857 PHONE 708/697-8460 FAX 708/468-8500

MEMORANDUM

TO: Scott Davies, Safety-Kleen Corp.

FROM: TriHydro Corporation (Project: 32-01)

DATE: July 20, 1994

SUBJECT: Draft IEPA Approval Letter, Dolton RFI Workplan

Safety-Kleen, TriHydro, and IEPA (Jim Moore, Eric Minder, Ken Lovett) held a conference call on July 18, 1994, to discuss the draft IEPA response on the Dolton RFI Workplan. Following is a brief list of action items:

Condition 2 - Completion date will be changed by IEPA to six months from date of approval letter.

Condition 4 - IEPA will review whether five boreholes already planned around Process Building/South Warehouse are adequate (Reference Figure IV-1-2).

Condition 6 - Safety-Kleen offered to conduct a soil gas survey at a 40-foot grid interval, and then follow workplan procedures, siting the two sampling locations in disturbed area at locations of highest soil gas concentrations (if any). IEPA will evaluate and respond.

Condition 7 - IEPA concurs with sampling approach, because shallow ground water (approximately 3- to 10-foot interval) will be screened at every soil sampling location.

Condition 8 - Scott Davies provided information that McKesson and Safety-Kleen did and do not allow PCB-contaminated waste into facility. Scott Davies will check with Bob Nagle (former Barker Chemical employee) to determine Barker policy, and respond to IEPA.

Condition 9 - Procedure to determine background will be deferred until data from the non-background sites have been collected and evaluated.

Condition 10 - No background samples will be collected at this time.

Condition 13 - IEPA says this is standard paragraph, and refers to lab analytical work. IEPA requests that lab certifies to this to avoid the necessity for extensive QAPR.

Condition 14 - IEPA will allow 10 eV lamp.

Condition 16 - John Ahern will check on possible detection limits for TCLP and respond to IEPA. Jim Moore requests that detection limits be at or less than Class I standards preferably, but certainly no higher than Class II standards. IEPA will change third sentence to organic chemicals only.

Condition 20 - IEPA will provide Attachment C. Lovett says that anything within 10 feet of ground surface will be Class II. Below that may be Class I. IEPA will take condition out.

Condition 21 - IEPA will eliminate this condition.

Condition 26 - John Ahern will provide revised wording on OSHA training requirements.

Condition 27 - IEPA will remove "a" through "d."

Condition 28 - Date of first submittal will change.

Condition 30 - IEPA will remove condition.

Ken Lovett requested that Safety-Kleen provide a CAD map of facility with well locations and a legal description. The IEPA goal is to get regulated facilities into GIS and send in ground-water data electronically. Scott Davies said he would check if Safety-Kleen can do this.

32-01

State of Illinois
ENVIRONMENTAL

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 15
To Scott Davies | From Eric Winder
Co. Safety-Kleen | Co. I.E.P.A.
Dept. | Phone # 217/524-3274
Fax # 708/468-8645 | Fax #

Mary A. Cade, Director

217/524-3300

Post-it™ brand fax transmittal memo 7671 | # of pages ▸
To Jack Pedersen | From Scott Davies
Co. | Co.
Dept. | Phone # S.K. Elgin
Fax # (307) 745-7729 | Fax #

Mr. Scott Davies
Safety-Kleen Envirosystems
1000 N. Randall Road
Elgin, Illinois 60123-7857

Re: ILD980612913 -- Cook County
Safety-Kleen Envirosystems
ILD980612913
Date Received: March 7, 1994
Log No. B-120-RFI-1

Dear Mr. Davies:

The RCRA Facility Investigation (RFI) Phase I Workplan for the above-referenced facility submitted by Safety-Kleen Envirosystems has been reviewed by this Agency. This workplan was submitted in accordance with Condition IV.B.2 of the RCRA Part B permit issued for the above-referenced facility (Log No. B-120) on September 28, 1993. The workplan is hereby approved subject to the following conditions and modifications:

1. This RFI Phase I Workplan shall be carried out to investigate for possible releases from the following solid waste management units (SWMUs):

SWMU NO.	NAME
1	Process Area
2	West Tank Farm Area (including Tank Farms #3, 4, 5 and 6 and Process Areas)
3	Former Southeast Tank Farm Area
4	East Field
5	Truck Stations #3, 4, 5, 6, 9 & 10
6	Driveway to Facility
7	Newly Sited Areas:

a. Former Barker Chemical Property
b. Former Rexnord/Precision Aire Property
c. Agri-chain Property

As stated in Condition IV.A.1 of the RCRA Part B Permit issued for the Safety-Kleen/Dalton facility, the purpose of the required Phase I investigation is to demonstrate whether or not hazardous wastes or hazardous constituents have been released from the SWMUs identified above. Therefore, the review of this RFI Phase I Workplan was conducted with this goal in mind.

2. RFI Phase I activities be completed by ~~December 1, 1994~~ six months from the date of this letter. When Phase I is complete, the owner or operator must submit to the Agency certification both by a responsible officer of the owner or operator and by an independent registered professional engineer that the facility completed Phase I in accordance with the specifications in the approved RFI Phase I workplan. In addition, a certification statement meeting the requirements of 35 IAC 702.126 must be provided by a responsible officer of the laboratory which conducted the chemical analyses that the requirements of this letter were met during the chemical analyses of all samples. This certification must address the applicable sample collection, preservation, handling preparation and analytical requirements set forth in this letter. These certifications must be received at this Agency after completing Phase I, or by February 1, 1995. These dates may be extended if Safety-Kleen submits information to the Agency indicating that it is attempting to complete the required activities in a timely manner but needs additional time to complete the investigation.

The attached certification forms must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the RFI. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5105 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or engineering services which are performed for a RFI workplan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Section 13.1 of the Illinois Professional Engineering Act.

As part of the certification, to document the RFI Phase I activities at your facility, please submit a Phase I Report and Summary which includes, at a minimum:

a. The information identified in Condition 29 below regarding the required soil sampling/analysis effort at each SWMU where such an investigation is necessary;

b. Information which the workplan indicates will be in the report;

c. A chronological summary of Phase I activities and the cost involved.

d. Color photo documentation of Phase I activities;

e. A description of the qualifications of personnel performing and directing the RFI activities including contractor personnel; and

f. A general discussion of the activities which should be carried out as part of Phase 2 of the RCRA Facility Investigation.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control — #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

3. If the Agency determines that implementation of this RFI Workplan fails to satisfy the requirements of Section IV of the RCRA Part B Permit (Log No. B-120), the Agency reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

4. The Agency cannot accept the proposed recommendation of no further investigation of the Process Area located within the South Warehouse Building, based on the results of a previous integrity evaluation. It was noted that the primary objective of the integrity inspection conducted by the registered professional engineer was to assess the existing integrity of the pavement and secondary containment structures relative to preventing migration of releases to underlying and/or surrounding soils. As such, the certification does not provide an evaluation of the potential for any past migration through the pavement or secondary containment structures.

Information regarding environmental investigations in the area of the Process Building indicate some contamination is likely present beneath and/or around the building. Samples collected from the borehole designated as 1979-2 indicated gasoline odors at the 2.5 and 5 foot depth interval (no mention of chemical odors were noted from the samples collected from the deeper intervals). Releases of hazardous wastes/hazardous constituents within the secondary containment system of the South Warehouse are documented. It is also stated within the subject submittal that minimal information regarding operations within the building is available for operations within the building prior to 1987. Therefore, ~~it is probable that releases~~ within the building may have occurred prior to 1987.

As such, the issue of whether the pavement and secondary containment system were adequate at that time is the issue; one which cannot be evaluated now. The integrity evaluation presented within the subject submittal did not demonstrate conclusively that the pavement and containment system of the Process Area have been impermeable over the entire operating life of the structure. Therefore, in order to determine whether the secondary containment system of the Process Area prevented migration of hazardous wastes/hazardous constituents, limited sampling/analysis should be conducted around the perimeter of the building. Field investigation should consist of ~~PID analysis of borings~~ a shallow soil gas survey conducted at intervals around the perimeter of the building, focusing on areas of apparent deterioration of the secondary containment system, if any. If such field investigations indicate high levels of contamination, sampling and laboratory analysis of soil samples should be conducted. Such field investigations will be reviewed in conjunction with the results of other environmental investigations/soil borings conducted in the area of the Process Building to determine if soil contamination is present, and if a RFI Phase II investigation is necessary.

Should field investigations indicate non-detectable levels of contamination, soil sampling/analysis should be conducted to demonstrate that Process Area operations had no impact on the soils and no further corrective active measures are necessary. To make this final demonstration, at least one sample must be collected from along each side and analyzed for the list of constituents identified in Condition 16 below. Such sample locations must be biased to locations where any released material may be present, such as locations near deteriorated areas of the containment system, low lying areas and stained areas.

5. Should the proposed environmental investigations in the area of the West Tank Farm include coring through the secondary containment system then the corings must be properly sealed to ensure the requirements of 35 IAC 724. Subpart J are met. After the corings are sealed, an integrity evaluation, in accordance with the procedures outlined below, must be conducted after the proposed sampling/analysis activities have been completed for the West Tank Farm area.

The integrity evaluation should be conducted as follows:

> An independent registered professional engineer shall inspect the integrity of the concrete surfaces. These surfaces shall be inspected for cracks which penetrate through the concrete/asphalt. In addition, all construction joints must be inspected to ensure that they are watertight. This inspection must be carried out in accordance with the standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society for Testing and Materials, the American Society of Civil Engineers, etc.,

which relate to the ability of the concrete/asphalt to contain liquids. The results of this inspection shall be submitted in the form of a report. The report must include (1) a discussion of the procedures used to conduct the inspection, including reference to the standards/recommended procedure used, (2) the results of the inspection, (3) scaled drawings showing the location of all cracks and construction joints observed during the investigation, (4) conclusions reached regarding any cracks or construction joints observed in the areas of concern, (5) justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas are indeed watertight), and (6) photographs to support the conclusions reached.

Additionally, if environmental investigations include coring through the concrete/asphalt surfaces of the tank farm, Safety-Kleen should provide diking around the cored area until the surfaces have been adequately sealed. This diking is necessary to minimize the potential for any release of hazardous waste/hazardous constituents into the underlying soils while this investigation is being conducted.

6. A review of Agency files indicates disposal activities may have taken place on the Barker Chemical site located north of the Safety-Kleen facility on 138th Street. A June 20, 1985 report by Ecology and Environment states that solvent contaminated still bottoms were dumped directly onto the ground, and numerous containers holding wastes were observed to be leaking during IEPA and USEPA inspections. Since waste disposal practices have been documented at this site, the proposed environmental investigations should be expanded in an effort to demonstrate that no contamination is present on the property now owned by Safety-Kleen. ~~To demonstrate that no contamination exists, soil sampling/analysis should be conducted in the "disturbed area". The soil sampling should be conducted based on a grid, with a grid interval of no greater than 40 feet. Soil samples should be collected at shallow intervals (e.g., 0-12 and 18-30 inches), and analyzed for those constituents listed in Condition 16 below. Should the results of such investigations indicate no environmental impacts, then the Barker Chemical property will not be considered a SWMU of concern, and no additional RFI investigations will be required for this area.~~

The report is not specific whether these activities occurred on property owned by Safety-Kleen north of 138th Street.

may have occurred

A soil gas survey where soil gas concentrations exceed those background

If soil gas concentrations do not exceed those background, the site will be investigated in accordance with procedures in the Workplan.

7. From review of the proposed sampling/analysis plan, ~~the intent of collection of samples for laboratory analysis only from the 1-3 feet and 20 foot intervals is unclear. It is stated that the purpose for collection/analysis of the sample at the 2 foot depth interval is to provide a summary of the constituents of concern for that area. However, boring logs presented in the subject submittal indicate that, in some areas, contamination was first detected at intervals deeper than the 1-3 feet range. It is noted that the borings were conducted at a minimum of 6 years ago, and the constituents of concern appear to be volatile organics~~

detect the occurrence and nature

Therefore, samples collected from the 20-foot interval will be used to define vertical extent.

~~which are generally more mobile (both vertically and horizontally) in the stratigraphy underlying the Safety-Kleen facility. Laboratory analysis of soil samples should be based on the field screening procedures proposed in the subject submittal; Chemical analysis of samples from the depth interval which indicate the highest levels (i.e., visual impact, field analysis, etc.) of contamination.~~

At this time the Agency is under the impression that only the intent of the sampling and analysis is not to demonstrate whether certain ~~that the~~ areas under investigation are "clean"; ~~rather, the investigations are focused on~~ but also to define defining the constituents of concern for corrective action.

8. The proposed analytical parameter list proposed in the subject submittal appears adequate to detect most of the parameters which were managed at the facility. However, since little information is known regarding the types or volumes of wastes managed at the facility while under Berker Chemical operation, the possibility of parameters outside the list proposed in the submittal is possible. One of the Agency's concerns is the potential for mismanagement/releases of waste oils containing PCBs at the site. Therefore, ~~all~~ soil samples collected for laboratory analysis must be analyzed for PCBs in accordance with SW-846 Method 8080. Should the Phase I sampling and analysis results indicate that PCBs are not constituents of concern at this facility, the requirement for analysis for these parameters will be dropped from the Phase II assessment.

from the shallow interval at sites EP-1, W-2, W-6, D-1 and Berker Chemical (reference Figure III-7 for locations)

9. The Agency cannot accept the proposed background sampling/analysis plan as proposed. ~~The Agency requires that a minimum of 10 background samples be collected from each soil strata to provide an acceptable background data set. A minimum of 10 background samples must be collected to demonstrate a statistically significant data set. Further, the depths at which background samples will be collected was not indicated in the submittal. Safety-Kleen must provide the Agency with additional information on background sampling and analysis, addressing the items above.~~

Background sampling, if necessary, will be deferred to Phase II.

The subject submittal did not clearly describe the use of background data to be collected. However, it is presumed that the background analytical data will be utilized as criteria in determinations of whether SWMUs have impacted soils at the facility. Safety-Kleen must provide the Agency with additional information on how background data will be used as an environmental impact criteria. Additionally, Safety-Kleen should propose the statistical analysis, if any, to be used on the raw background data. ~~Statistical methods must be approved by the Agency prior to utilization.~~

10. The intent of use of background samples as field blanks is unclear to the Agency. The purpose of field blanks is to determine whether field sampling practices may have allowed contamination (e.g., field contamination, cross contamination) of laboratory samples. The blanks provide a reference by which the extent of contamination by field

practices can be quantified. Use of an environmental sample in which natural contaminants vary in concentration from location to location around the site would appear to be an unacceptable basis for use as a blank. Therefore, the proposal to use the background samples as field blanks is unacceptable to the Agency. Background samples may be used however to provide general insight into potential contamination of soil samples during handling, transport and analysis.

11. In the event that soil conditions do not allow complete recovery in accordance with Attachment 7, Safety-Kleen must conduct sampling in a manner to minimize volatilization of organic compounds. Such procedures should include minimization of disturbance of the sample (i.e., no mixing, no compositing, no aeration), minimal handling of the samples between collection and preservation, and adequate preservation of the samples (e.g., no headspace, storage of the samples on ice).

12. ~~The proposal to use Tyvek as a sample tube sealant, instead of aluminum foil in accordance with Attachment 7, is not considered acceptable to the Agency. Safety-Kleen has not demonstrated that Tyvek is an inert material and will not comb contaminants to/from the samples. Therefore, the Agency will require that aluminum foil be used in accordance with Attachment 7.~~ Teflon however is an acceptable replacement for aluminum foil.

(X) specifies

13. All Quality Assurance/Quality Control (QA/QC) procedures must be conducted in accordance with those as outlined in SW-846, Chapters 1 and 2. The use to these standardized procedures for QA/QC will allow a standardized review of the analytical data. All preservation and handling, including chain of custody, of the samples shall be conducted in accordance with the appropriate procedures outlined in SW-846, Chapter 2, and any required procedures outlined in the specific sample analytical method.

~~14. The proposal to use a 10.0 eV lamp in the photoionization unit is not considered acceptable to the Agency. The apparent purpose of use of the photoionization unit is to determine the total organic volatile concentration of the soil samples. Therefore, it seems logical to use a lamp which will detect the widest range of volatile compounds. The Agency will require use of a 9.8 eV lamp for field analysis, since this lamp will detect a wider range of volatile parameters.~~

(X)

14 15. Since the results of the photoionization unit analysis will be useful in determination of the extent of contamination within each of the boreholes, the Agency requires that Safety-Kleen provide the Agency with a report detailing the results of the photoionization unit analysis in tabular form. This report should include at a minimum: 1) documentation that the unit was operated in accordance with the manufacturer's specifications, 2) a description of the calibration procedures used as part of each investigation effort, 3) analysis procedures, and 4) a summary of the analytical results by depth and by borehole. This information should be presented in the RFI Phase I Report.

15 16. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit achieved during the analysis of the TCLP extract must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. Each soil sample collected for laboratory analysis must be analyzed for, at minimum: (for selected samples Reference Comment 8)

- SW-846 Method 8240 for volatile organic compounds;
- SW-846 Method 8270 for semi-volatile compounds;
- SW-846 Method 8080 for PCBs; and ; 7470
- SW-846 Methods 1311, 2050, 6010, ~~7471~~ and 7740 for metals (note that the analyses for metals must be conducted on the extract from the TCLP test) (all samples collected at 2 feet)
- (X) SW-846 Methods 1311, 2050, 6010, 7470, 7740, 7131 and 7421 for metals in samples collected at 20 feet (who TCLP test)

16 17. The following procedure must be utilized in the collection of all required soil samples:

a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

1. The procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;

d. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations where VOCs are a concern;

e. All other soil samples must be collected in accordance with the procedures set forth in SW-846; and

f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

17 ~~16~~. If the Agency's DLPC determines, based on the data obtained from the Phase I Workplan activities, that there has been no release of hazardous waste or hazardous constituents to the environment from a SWMU identified in Condition 1 above, then no further investigative action will be required for that SWMU. If the Agency's DLPC determines, based on the data, that there has been a release of hazardous waste or hazardous constituents to the environment or that the data is inconclusive, the Permittee will be notified by the Agency's DLPC.

18 ~~17~~. If Safety-Kleen conducts a Phase I investigation which differs from the described above, then it must provide adequate justification in the report required by Condition 2.a above for the variances. As stated in Condition 1 above, the Agency feels that the requirements set forth in this letter are necessary to reach a conclusion that there has not been a release from a given SWMU. If the goals of Safety-Kleen are somewhat different than this, then there may be justification for varying from the requirements set forth in this letter.

19 ~~20~~. The Illinois Pollution Control Board finalized regulations establishing groundwater quality standards for the State of Illinois (see 35 IAC 620). As such, the Agency must ensure that the soil cleanup objectives established for this facility will not cause any future violations of these standards. Therefore, unless site specific information is submitted to the Agency to indicate otherwise, soil cleanup objectives for this site will be based upon the protection of Class I groundwater (potable resource groundwater). Guidance regarding the information which must be provided to the Agency for review and approval demonstrating that the soil cleanup objectives should be based upon the protection of Class II groundwater (general resource groundwater) is provided in Attachment C. In addition, groundwater cleanup objectives will also be developed assuming Class I groundwater, unless sufficient information is provided to indicate otherwise.

~~21. Any equipment, including heavy earth movers or smaller tools, shall be scraped to remove any residue. Following this, the equipment must be steam cleaned and triple rinsed. All residues, wash and rinse water shall be collected and managed as a hazardous waste if analysis of the waste detects the presence of hazardous constituents or it exhibits a characteristic of hazardous waste. In any event the material must be managed as a special waste.~~

(X)

20 ~~22.~~ All wastes generated as a result of corrective action activities (e.g., soil cuttings, purged groundwater, equipment decontamination wash and rinsewaters, etc.) are considered Pollution Control Wastes under the provisions of 35 Ill. Adm. Code Part 809, and therefore, at a minimum, classified as a special waste. Safety-Kleen must appropriately characterize these wastes to determine if they are hazardous by characteristic or listing. Should it be determined that these wastes are hazardous, they must be managed as a hazardous waste. In any event, these wastes are considered special wastes, and must be managed as a special waste.

21 ~~23.~~ The Agency does not accept the use of the corrective action values specified in 55 FR 30798-30884 (July 17, 1990) as a criteria to determine if a particular SWMU has had an impact on human health and the environment. The Agency notes that these levels are proposed, and have not gone into effect on the State or Federal level. When these values were proposed, IEPA submitted substantial comments regarding their inadequacy. Also, it must be noted that the proposed soil action levels did not address the impact the residual soil contamination would have on groundwater. The Agency requires that any action level or cleanup objectives used in Safety-Kleen corrective action plan be demonstrated not to adversely impact human health and the environment.

22 ~~24.~~ Financial assurance for completion of the approved RFI Phase I activities must be provided to the Agency within 60 days of the Agency approval date of the Phase I RFI Workplan.

23 ~~25.~~ In accordance with 35 Ill. Adm. Code 702.126, Safety-Kleen must provide the Agency with certification of the Phase I RFI Workplan report to be submitted to the Agency after completion of the approved Phase I activities. In addition, the Agency requires that a certification be provided for all laboratory work performed for the purpose of the Phase I activities be provided. Forms for both certifications described above are included as attachments to this Agency response.

24 ~~26.~~ The Health and Safety Plan contained in the subject workplan is neither approved nor disapproved. Under the provisions of 29 CFR 1910 (51 FR 16,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three one days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

(*) 24

Page 11

25. ~~27.~~ Reports must be prepared and submitted to the Agency which describe the activities completed each quarter of the calendar year while the Phase I investigation is being carried out. The quarterly reports shall contain at a minimum:

a. ~~Action levels for groundwater must meet the requirements of 35 IAC 620.~~

b. Levels for soil which "trigger" a Phase II investigation will not be established until the Phase I investigation has been completed and the results of the investigation have been reviewed by the Agency.

c. The soil levels which "trigger" a Phase II investigation may not be the same as the levels which "trigger" corrective actions. These final action levels will be developed after the RFI is complete.

d. Final Agency action on all action levels will be subject to the appeal provisions of Section 39(a) and 40(a) of the Illinois Environmental Protection Act.

a ~~g.~~ An estimate of the percentage of the investigation completed;

(*) b ~~f.~~ Summary of activities completed during the reporting period;

c ~~g.~~ Summaries of all actual or proposed changes to the Workplan or its implementation;

d ~~h.~~ Summaries of all actual or potential problems encountered during the reporting period;

e ~~k.~~ Proposal for correcting any problems;

f ~~j.~~ Projected work for the next reporting period; and

g ~~k.~~ Other information or data as requested in writing by the Agency's DLPC.

26. ~~28.~~ A quarterly report for the work completed from the date of this letter to ~~July 1, 1994 (the first quarter of the current calendar year during which the required Phase I investigation is taking place)~~ must be submitted to the Agency by ~~July 15, 1994~~. Subsequent quarterly reports must be submitted in a similar manner until the final Phase I RFI Report is submitted to the Agency.

(*) the fifteen day after the calendar quarter

27. ~~29.~~ The portion of the final RFI Phase I report documenting the results of the required soil sampling/analysis effort must contain the following information, for each SWMU investigated:

a. A discussion of (1) the reason for the sampling/analysis effort conducted at each SWMU and (2) the goals of the sampling analysis effort conducted at each SWMU;

b. A scaled drawing showing the horizontal and vertical location where all soil samples were collected at each SWMU;

c. Justification for the locations from which soil samples were collected;

d. A description of the procedures used for:

1. Sample collection;

2. Sample preservation;

3. Chain of custody; and

4. Decontamination of sampling equipment.

e. Visual classification of each soil sample collected for analysis;

f. A discussion of the results of any field screening efforts;

g. A description of the soil types encountered during the investigation, including scaled cross-sections;

h. A description of the procedures used to analyze the soil samples, including:

1. The analytical procedure used, including the procedures, if any, used to prepare the sample for analysis;

2. Any dilutions made to the original sample;

3. Any interferences encountered during the analysis of each sample; and

4. The practical quantitation limit achieved, including justification for reporting PQLs which are above those set forth in SW-846.

i. A description of all quality control/quality assurance analyses conducted, including the analysis of lab blanks, trip blanks and field blanks;

j. A description of all quality assurance/quality control efforts made overall;

k. A summary of all analytical data, including QA/QC results, in tabular form;

1. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting quality assurance/quality control data;

m. Colored photographs documenting the sampling effort; and

n. A discussion of the collected data. This discussion should identify those sample locations where contaminants were detected and the concentrations of the contaminants. Conclusions which can be drawn from the information compiled should also be included in this discussion.

(X) ~~30. All references to the "Agency's RCRA closure plan instructions" refer to the document entitled Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities, December, 1990. A copy of this document is enclosed.~~

Should you have any questions regarding this matter, please contact Eric Minder at 217/524-3274.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:EM/mls/sp323W/1-13

Attachments: RFI Phase I Certification
RFI Phase I Laboratory Certification Statement

cc: USEPA Region V -- George Harper

Safety-Kleen
Dolton, Illinois

Log No. B-120 RFI-1

Upon completion of Phase I of the RFI, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and by the registered professional engineer overseeing all work associated with the investigation. Submit one copy of the certification with original signatures and three additional copies.

RFI Phase I activities at the facility described in the RFI Phase I Workplan have been completed in accordance with the specifications in the approved RFI Workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number _____ Facility Name _____

Signature of Owner/Operator _____ Date _____ Name and Title _____

Signature of Registered P.E. _____ Date _____ Name of Registered P.E. and Illinois Registration Number _____

Mailing Address of P.E.: _____

Registered P.E.'s Seal:

_____

_____

_____

DMC:EM/mls/sp3234/14

Phase I of the RCRA Facility Investigation
Safety-Kleen
Dolton, Illinois
Log No. B-120-RFI-1

Upon completion of Phase I of the RFI, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and (2) a responsible officer (as defined in 35 IAC 702.126) of the laboratory which conducted the chemical analyses required as part of Phase I of the RFI. The original of this statement shall accompany the original certification statement for the overall Phase I activities and the RFI Phase I Report.

The sample collection, handling, preservation, preparation and analysis conducted as part of Phase I of the RFI at the facility described in this document has been conducted in accordance with the specifications in the approved workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title of Owner/Operator Representative
Name of Laboratory	Signature of Laboratory Responsible Officer Date
	Name and Title of Laboratory Responsible Officer

Mailing Address of Laboratory:

____

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DMC:FM/mls/sp323W/15

USEPA

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April 23, 1991

Mr. Lawrence Eastep
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

RE: Safety-Kleen Corp.

Dear Mr. Eastep:

On March 4, 1991, representatives of Safety-Kleen and IEPA met in Springfield to discuss changes the Company planned for its Elgin and Dolton Recycle Centers. The Company made a detailed presentation of its plans and timetable for:

a. moving Elgin recycle operations to Dolton;

b. moving the Arlington Heights and Schaumburg branch facilities onto the sited portion of the Elgin facility;

c. moving the Mokena branch onto the newly sited area of the Dolton facility; and

d. closing the existing Arlington Heights, Schaumburg and Mokena branches.

The Company representatives also provided a detailed explanation regarding the applications for permit modifications and interim status revisions the Company would be filing to implement the planned changes outlined above. The Company sought and obtained input from the Agency on the form of the applications, and the anticipated timing of Agency action once the applications were submitted.

The Company submitted all of the applications, as promised, promptly after the March 4th meeting. We are concerned that to date it does not appear that the Agency has responded to those applications in a manner consistent with the schedule discussed at the meeting. In fact, as discussed below, it does not appear that the Agency has addressed any of the applications to date.

16

1. DOLTON PERMIT MODIFICATIONS

A. *Design Changes of Tank Farms #7 and #8*

At the March 4th meeting, the company advised that it would be proposing a modification to the IEPA approved Dolton's interim status change to include minor design changes to Tank Farms #7 and #8. In response to this proposal, the Agency told us that the changes could not be made administratively and Safety-Kleen should apply for a permit modification. In addition, the Agency told us that, given the minor nature of the modifications, it should be able to approve the permit modification after the minimum public comment period of twenty-one (21) days.

Safety-Kleen sent the public notices to government officials regarding the proposed design changes to Tank Farms #7 and #8 on March 5, 1991. The application to incorporate the design changes for Tank Farms #7 and #8 was submitted to the Agency on March 8, 1991.

Desi Chari contacted Ted Dragovich on April 10 to find out the status of the Dolton's permit modification to the previously approved interim status change. Ted told Desi that he had not started the review of the application and that he would try to approve the modification by the end of that week (4/12).

Desi contacted Ted again on April 17 and was advised that Ted had still not started the review. This time Ted would not commit to a permit decision date, but said he would try to get it out as soon as possible. Desi advised Ted that Safety-Kleen's contractors were waiting at the Dolton facility to commence Tank Farm #7. Ted did assure Desi that he would try to get the permit out ASAP and would Federal Express the permit after it is signed. To date it has not been issued.

B. *Permit Modification To Include Newly Sited Areas*

On March 20, 1991, Safety-Kleen submitted Interim Status and IEPA operating permit modifications for the Dolton Recycle Center to include: (a) the Mokena Service Center; and (b) the west warehouse for the recycle center on the newly sited areas. The company has not heard anything on these applications.

2. ELGIN PERMIT MODIFICATIONS

A. *Class 2 Modification*

On March 4, 1991, the company informed the Agency that Safety-Kleen would submit a Class 2 modification to accommodate the re-location of the Arlington Heights and Schaumburg service centers to Elgin. This includes construction of a different container storage area (no increase in volume) and

modification of the waste analysis plan to tailor it to the service center operations. (The relevant waste analysis plan has already been approved by IEPA for other Illinois facilities.)

The Class 2 modification request was submitted on March 11 and a public meeting was held on April 15. No substantial comments were made at the public meeting.

B. *Temporary Authorization*

During the meeting on March 4, 1991, the company informed IEPA that Safety-Kleen planned to apply for a Temporary Authorization (TA) to commence construction of the new container storage area for the service center operations at Elgin. The Agency asked the company to submit the TA and the Class 2 modification request at the same time and the Agency would act on the TA within thirty (30) days.

The application for the TA was submitted on March 11 under a separate cover from the Class 2 modification. When Desi Chari asked Ted Dragovich the status of the TA on April 10, and again on April 17, Ted told him that he had not started the review of the TA or the Class 2 modification. As in the case of the Dolton modification, Ted could not commit to a date when the Elgin modifications would be approved.

We would appreciate the Agency's effort to expedite the above described applications, particularly the request for design modification of Tank Farms #7 and #8 and the Temporary Authorization for Elgin. Thank you for your cooperation and assistance.

Yours truly,

Bruce White

BW/jw
JWSK240
cc: Ted Dragovich
Stan Walczynski
Desi Chari
Bill Miner
Sherry Holland, Esq.